

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE: FRANK WESTMORELAND
AND PAMELA WESTMORELAND**

CHAPTER 13

DEBTORS

CASE NO. 12-13296 JDW

**OMNIBUS OBJECTION TO CLAIMS OF
MARSHALL COUNTY TAX COLLECTOR**

COME NOW, Frank Westmoreland and Pamela Westmoreland, by and through their counsel of record, pursuant to Sections 1305 and 502 of the Bankruptcy Code and Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and files this their Omnibus Objection to certain claims filed herein by Marshall County Tax Collector, and in support thereof would state as follows:

Claimant receiving this objection should located herein its name and the claims which are the subject of this objection.

Claimant subject to this objection is Marshall County Tax Collector.

Claims filed hereby by the claimant which are subject to this objection are numbered 11 and 12, copies of which have been filed with the Court.

Claim No. 11 was filed in the amount of \$1,741.95 and Claim No. 12 was filed in the amount of \$1,821.05 for personal property taxes assessed to Potts Camp One Stop. The Debtors were not operating Potts Camp One Stop in 2009 or 2010 and said debt should not be allowed to be paid through this plan.

The finality of any order regarding objection included in this Omnibus Objection shall be determined as through the claim had been subject to an individual action.

WHEREFORE, PREMISES CONSIDERED, Debtors pray that this Omnibus Objection be received and filed and upon hearing that this Court enter its order sustaining Debtors' Omnibus

Objection and for such other, further and general relief to which Debtor and this bankruptcy estate may be entitled.

RESPECTFULLY SUBMITTED,

/s/ Karen B. Schneller

KAREN B. SCHNELLER, MSB #6558

ATTORNEY AT LAW

POST OFFICE BOX 417

HOLLY SPRINGS, MISSISSIPPI 38635

(662) 252-3224

CERTIFICATE OF SERVICE

I, Karen B. Schneller, Attorney for Debtors, do hereby certify that I have this day forwarded, a true and correct copy of the above and foregoing Omnibus Objection to Claims of Central Financial Control, either by electronic means or by United States Mail to the following: .

**Marshall County Tax Collector
Post Office Box 40
Holly Springs, MS 38635**

**Locke Barkley
Chapter 13 Trustee
P.O. Box 55829
Jackson, Mississippi 39296**

**Office of U.S. Trustee
501 East Court Street, Suite 6-430
Jackson, Mississippi 39201**

This the 8th day of February, 2013.

/s/ Karen B. Schneller
KAREN B. SCHNELLER